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16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 vs.
23 **DECLARATION OF PATRICK
24 SCHMIDT IN SUPPORT OF PLAINTIFF
25 WAYMO LLC'S ADMINISTRATIVE
26 MOTION TO FILE UNDER SEAL
27 PORTIONS OF ITS MOTION TO
28 COMPEL WITH RESPECT TO ITS
SECOND SUBPOENA SERVED ON NON-
PARTY ANTHONY LEVANDOWSKI**

29 Defendants.

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1 I, Patrick Schmidt, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
 7 Seal Portions of its Motion to Compel With Respect To Its Second Subpoena Served On Non-Party
 8 Anthony Levandowski (the “Motion”), filed concurrently herewith (the “Administrative Motion”).
 9 The Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Motion	Blue highlighted portions	Defendants
Waymo’s Motion	Yellow highlighted portions	Non-Party Sandstone, LLC / Ognen Stojanovski / Tyto LiDAR, LLC
Ex. 3	Entire document	Non-Parties Sandstone, LLC / Ognen Stojanovski / Tyto LiDAR, LLC
Ex. 4	Entire document	Non-Parties Sandstone, LLC / Ognen Stojanovski / Tyto LiDAR, LLC
Ex. 5	Entire document	Defendants
Ex. 6	Entire document	Defendants
Ex. 7	Entire document	Non-Party Sandstone, LLC
Ex. 8	Yellow highlighted portions	Non-Party Ognen Stojanovski
Ex. 9	Entire document	Non-Party Tyto LiDAR, LLC
Ex. 10	Entire document	Non-Party Tyto LiDAR, LLC
Ex. 12	Entire document	Non-Party Tyto LiDAR, LLC

1 3. The highlighted portions of Waymo's Motion contains references to information that
2 Defendants and/or Third Parties have designated as confidential and/or highly confidential.

3 4. Waymo expects Defendants and/or Third Parties to file one or more declarations in
4 accordance with the Local Rules.

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6 I declare under penalty of perjury under the laws of the State of California and the United
7 States of America that the foregoing is true and correct, and that this declaration was executed in Los
8 Angeles, California, on August 4, 2017.

9 By /s/ Patrick Schmidt
10 Patrick Schmidt
11 Attorney for WAYMO LLC

12 **SIGNATURE ATTESTATION**

13 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
14 filing of this document has been obtained from Patrick Schmidt.

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16 /s/ Charles K. Verhoeven
17 Charles K. Verhoeven

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